

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY, *et al.*,

Plaintiffs,

v.

THE PALESTINE LIBERATION
ORGANIZATION and THE PALESTINIAN
AUTHORITY,

Defendants.

Case No. 18-cv-12355 (MKV)

**STIPULATION AND ORDER
REGARDING ACCESS TO DISCOVERY MATERIAL FROM
SHATSKY V. PLO, CASE NO. 02-CV-2280 (RJL) (D.D.C.)**

Plaintiffs and Defendants (collectively, the “Parties”), through undersigned counsel, represent and stipulate as follows:

1. All of the plaintiffs in *Shatsky v. PLO*, Case No. 02-cv-2280 (RJL) (D.D.C.) (“*Shatsky I*”) are Plaintiffs in this action.
2. The Palestinian Authority (“PA”) and the Palestine Liberation Organization (“PLO”) were defendants in *Shatsky I* and are Defendants in this case.
3. One counsel who represented plaintiffs in *Shatsky I* has also appeared on behalf of Plaintiffs in this action.
4. Counsel for the PA and PLO in *Shatsky I* is also counsel for the PA and PLO in this action.
5. The parties to *Shatsky I* produced documents, answered interrogatories, and provided deposition testimony in that action (the “*Shatsky I* Discovery Material”), subject *inter alia* to the terms and conditions set forth in the Protective Order Regarding Confidentiality of

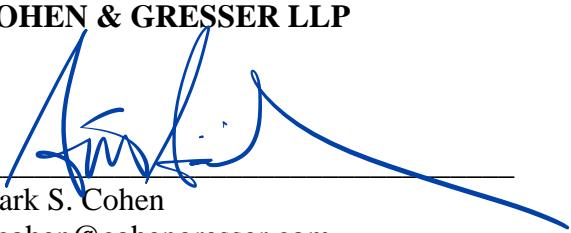
Discovery Material (the “*Shatsky I* Protective Order”), which is at Docket Entry No. 157-2 in *Shatsky I*.

6. The undersigned, as counsel for Plaintiffs and Defendants in this action, stipulate and agree that, pending entry of a Protective Order in this case, which will supersede the *Shatsky I* Protective Order adopted by this Stipulation, the Parties and their counsel shall have access to and may use in this case the *Shatsky I* Discovery Material, subject to the terms and conditions set forth in the *Shatsky I* Protective Order, and subject to the reservations stated in paragraph 7 of this Stipulation. For purposes of this paragraph, references in the *Shatsky I* Protective Order to “this litigation” or “the above-captioned action” shall be deemed to encompass this action as well as *Shatsky I*.

7. The Parties otherwise reserve all of their rights and arguments as to the use in this action of information or materials produced in discovery or otherwise in *Shatsky I*, and are entering into this Stipulation without prejudice to any such rights or arguments. No party shall argue that any other party, by entering into this Stipulation, has waived or otherwise prejudiced any right or argument relating to the use in this action of information or materials produced in discovery or otherwise in *Shatsky I*.

SO STIPULATED AND AGREED TO on this 20th day of January, 2021.

COHEN & GRESSER LLP



Mark S. Cohen
mcohen@cohengresser.com
Stephen M. Sinaiko
ssinaiko@cohengresser.com
Ronald F. Wick (admitted *pro hac vice*)
rwick@cohengresser.com
800 Third Avenue

SQUIRE PATTON BOGGS (US) LLP



Gassan A. Baloul (GB-4473)
gassan.baloul@squirepb.com
Mitchell R. Berger (MB-4112)
mitchell.berger@squirepb.com
2550 M Street, NW
Washington, DC 20037
Telephone: (202) 457-6000

New York, New York 10022
Telephone: (212) 957-7600

Facsimile: (202) 457-6315

Attorneys for Plaintiffs

Attorneys for Defendants

SO ORDERED:

Hon. Mary Kay Vyskocil
United States District Judge

Dated: